

Approved: \_\_\_\_\_

JENNIFER N. ONG / RYAN W. ALLISON  
Assistant United States Attorneys

Before: THE HONORABLE JUDITH C. McCARTHY  
United States Magistrate Judge  
Southern District of New York

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: COMPLAINT  
UNITED STATES OF AMERICA :  
: Violations of 18 U.S.C.  
- v. - : \$ 875(c)  
: KAREEM FORD, :  
: COUNTY OF OFFENSE:  
: ORANGE  
Defendant. :  
: ----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS L. ANDERSON, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

(Threatening Interstate Communications)

1. On or about December 2, 2022, in the Southern District of New York and elsewhere, KAREEM FORD, the defendant, knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to kidnap a person or injure the person of another, to wit, FORD sent two direct messages via a social media application to a journalist ("Victim-1") and threatened physical harm to Victim-1.

(Title 18, United States Code, Sections 875(c).)

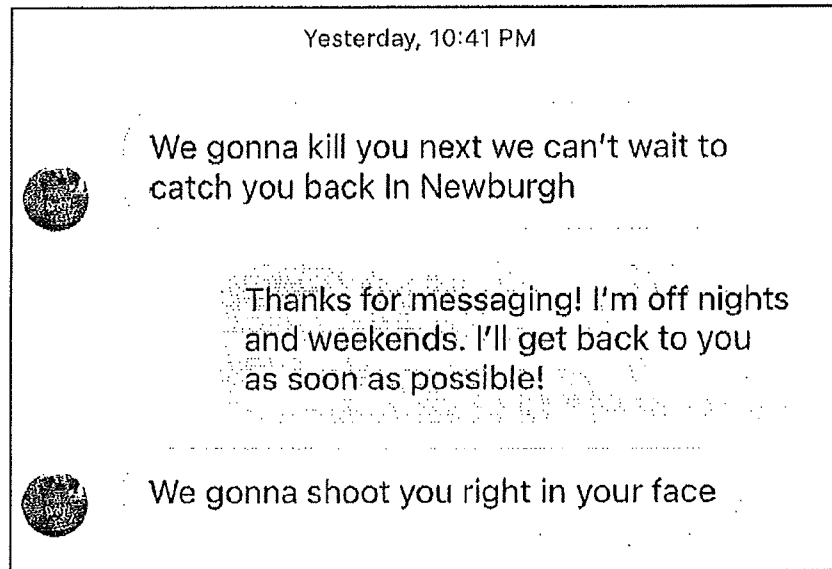
The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Special Agent with the FBI, assigned to the FBI's Hudson Valley Safe Streets Task Force. I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the

investigation of this matter, as well as on my conversations with other law enforcement officers and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the investigation. Where the contents of documents or the actions, statements, or conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my review of FBI reports and records and my conversations with other law enforcement officers, I have learned the following, in substance and in part:

- a. Victim-1 is a journalist.
- b. On or about December 2, 2022, Victim-1 was covering an FBI raid in Newburgh, NY and posted videos of the raid to Victim-1's account with a social media application (the "Social Media App.").
- c. At approximately 10:41 p.m. on or about December 2, 2022, Victim-1 received two direct messages to Victim-1's account with the Social Media App. from an account with the username "redsunkist" ("Account-1"). A screenshot of the messages that Account-1 sent Victim-1 is included below:



4. Based on my training and experience and my review of open source materials, I know that the Social Media App. operates out of California and the servers for the Social Media App. are located outside of New York. Accordingly, the use of the Social Media App. occurs by sharing data in electronic format which crosses state lines.

5. Based on my review of basic subscriber information and IP address logs from the Social Media App. and my conversation with other law enforcement officers, I have learned that Account-1 is registered to KAREEM FORD, the defendant, to a phone number ending in 8371 (the "8371 Number") and an address located on South Street in Newburgh, NY (the "South Street Residence").

6. Based on my review of records from an Internet service provider ("ISP"), I know that IP address login for Account-1 on or about December 3, 2022, was from an ISP account subscribed to an individual ("Individual-1") at the South Street Residence and a number ending in 3003.

7. Based on my review of open source materials, I know that the 8371 Number is associated with KAREEM FORD, the defendant, at the South Street Residence along with an address in Springfield Gardens and Newburgh, NY.

8. Based on my conversations with other law enforcement officers, including a special agent with the FBI ("Agent-1"), I know that on or about December 6, 2022, Agent-1 and three law enforcement officers went to the South Street Residence. Upon arriving at the South Street Residence, Agent-1 spoke with Individual-1 who advised Agent-1 that KAREEM FORD, the defendant, lived on the third floor of the South Steet Residence. Individual-1 then led Agent-1 and the other law enforcement officers to the third floor where Agent-1 contacted FORD and FORD agreed to speak with Agent-1. Agent-1 did not place FORD in handcuffs and FORD voluntarily stated the following, in substance and in part, while inside the South Street Residence:

- a. When asked why he thought law enforcement was contacting him, FORD advised he thought it was because of Victim-1.

- b. Agent-1 showed FORD a screenshot of Account-1, and FORD verified that Account-1 was his social media account.
- c. FORD advised that he threatened Victim-1 because FORD had previously been upset that Victim-1 had reported on a triple homicide in or about January 2020 that was allegedly committed by FORD's family member. FORD advised that after Victim-1's reporting on that homicide, he fought with Victim-1 on social media.

WHEREFORE, the deponent respectfully requests that KAREEM FORD, the defendant, be imprisoned or bailed, as the case may be.

*Is/ Thomas L. Anderson by ven w/permission*  
THOMAS L. ANDERSON  
Special Agent  
Federal Bureau of Investigation

Sworn to me through the transmission of this Complaint by reliable electronic means, pursuant to Federal Rule of Criminal Procedure 4.1, this 18<sup>th</sup> day of January, 2023.

*Judith C. McCarthy*  
THE HONORABLE JUDITH C. MCCARTHY  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK